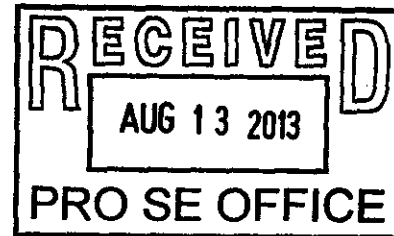


UNITED STATES DISTRICT COURT
~~SOUTHERN~~ DISTRICT OF NEW YORK

~~Eastern~~

Devorah Shabto;



(In the space above enter the full name(s) of the plaintiff(s).)

-against-

CV 13 COMPLAINT **4580**

Jury Trial: ☒ Yes ☐ No
(check one)

Eric Leronde Steven
Golden, NYPD Detective
Yogla NYPD Derek Wright
NYPD detective Jon Hafter

VITALIANO, J.
GOLD, M.J.

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)

I. Parties in this complaint:

- A. List your name, address and telephone number. If you are presently in custody, include your identification number and the name and address of your current place of confinement. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff

Name

Devorah Shabto;

Street Address

County, City

State & Zip Code

Telephone Number

- B. List all defendants. You should state the full name of the defendant, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1

Name Eric Levarde
 Street Address 701 San Sebastian Creek
 County, City Boca Raton
 State & Zip Code FL 33433
 Telephone Number (561) 216-1584

Defendant No. 2

Name Steven Golden
 Street Address 35-30 73rd St Apt 6B
 County, City Jackson Heights, NY
 State & Zip Code 11374
 Telephone Number (718) 593-7679

Defendant No. 3

Name NYPD detective Loglin
 Street Address 100 church street
 County, City NY, NY
 State & Zip Code 10007-2601
 Telephone Number _____

Defendant No. 4

Name NYPD Derek Wright
 Street Address 100 church street
 County, City NY, NY
 State & Zip Code 10007-2601
 Telephone Number _____

II. Basis for Jurisdiction:

NYPD Jon Harper
100 Church St
NY, NY 10007-2601

Federal courts are courts of limited jurisdiction. Only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000 is a diversity of citizenship case.

A. What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal Questions☐ Diversity of Citizenship

B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at issue?

false lawsuits from 1995 till
March 15 2013, defamation slander
civil rights violation of invalid arrests and
HPV transmission (STD) sexually transmitted

C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state(s) of citizenship _____

Defendant(s) state(s) of citizenship _____

III. Statement of Claim:

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. Where did the events giving rise to your claim(s) occur?

In Queens, NY

I had sex with defendant Golden and had HPV transmitted and was arrested in

B. What date and approximate time did the events giving rise to your claim(s) occur?

Queens

1995 - March 15, 2013

ultimately culminating with the last event ~~at~~ from

C. Facts:

Oct 2012 - March 15, 2013

What happened to you?

Who did what?

Was anyone else involved?

Who else saw what happened?

see attached facts

IV. Injuries.

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received.

I was emotionally, financially and socially damaged with 6 arrests.

V. Relief:

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking, and the basis for such compensation. _____

see attached
document

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 8th day of Aug, 20 13

Signature of Plaintiff

Mailing Address

Telephone Number

Fax Number (if you have one) _____

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint. Prisoners must also provide their inmate numbers, present place of confinement, and address.

For Prisoners:

I declare under penalty of perjury that on this _____ day of _____, 20____, I am delivering this complaint to prison authorities to be mailed to the *Pro Se* Office of the United States District Court for the Southern District of New York.

Signature of Plaintiff: _____

Inmate Number _____

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
DEVORAH SHABTAI,

Plaintiff

VERIFIED COMPLAINT
JURY DEMANDED

A

-against-

DOCKET:

ERIC LEVANDE, STEVEN GOLDEN, NEW YORK POLICE DEPARTMENT, NYPD DETECTIVE
COGLIN, DETECTIVE DEREK WRIGHT, DETECTIVE JON HAFNER.

Defendants

-----X

Plaintiff Devorah affirms the following under penalty of perjury:

Venue is in the Eastern District since the sex act between defendant Golden and myself occurred in Queens and there was an invalid, false arrests in Queens, New York. All the six arrests were dismissed. These arrests were used by Eric Levande to harrass me through the legal system and he used the NYPD detectives to help him harrass me.

BACKGROUND

1. I am the pro se plaintiff in the above mentioned case.
2. This suit is about six bogus, trumped invalid arrests perpetuated and provoked by Eric Levande in order to harrass me, slander me, lose custody or any visitation of my children and destroy me into shreds.
3. I believe that my ex-husband is himself a dangerous sociopath who met me and married me within 3 months to use me as a free surrogate mother and then viciously, wickedly and intentionally began a legal campaign to destroy me.
4. Eric Levande refused to pay rent of \$450 and refused to support me while being married to him claiming that he was bankrupt as a lawyer even though he had 5 offices in Pennsylvania and New Jersey at the time.
5. Eric Levande refused to support me and asked me to pay for his bills. He refused to rent an apartment claiming that he could not afford \$450. We lived in his parent's house on Colfax avenue where he also saw clients as an attorney. He finally rented a \$450 apartment at Clay avenue at the Pettinatoes house only to move back to his parents house 8 months later because he claimed he "cannot afford the rent".
6. Eric Levande sent his parents to harrass me for rent monies and to emotionally torture me.

7. One of those incidences his mother bit down on my index finger and pulled my hair while my baby daughter was with me. I received medical attention.
8. Eric Levande was a divorce, criminal and federal attorney who was suspended from the Pennsylvania and New Jersey Bar in 2000 for perjury and embezzlement.
9. Defendant Eric Levande had me arrested for an order of protection three months after marrying me and while being married to me in order to teach me a lesson.
10. While being married to Eric Levande, he had me twice committed to a mental hospital.
11. Eric Levande tortured me emotionally from 1995 till March 2013 by convincing the courts (Pennsylvania, new York and Florida) , law enforcements and private individuals to have me arrested, detained, committed to mental hospitals, take away my kids amd slander my reputation.
WICKEDLY AND INTENTIONALLY ERIC LEVANDE VICIOUSLY
FABRICATED THAT I WAS MENTALLY ILL TO THE LEGAL SYSTEM AND
USED THE LEGAL SYSTEM AS AN ATTORNEY TO HARRASS ME AND
HAVE ME ARRESTED BY SIX ARRESTS.
12. Viciously, wickedly and intentionally, Eric Levande took out orders of protections against me bogusly in Pennsylvania, New York and Florida even while I was in jail in Florida.
13. Viciously, wickedly and intentionally Eric Levande got his sister, mother and father to take out orders of protections against me while we were fighting custody and while I was in jail in Florida so that I would lose the appeal for custody.
14. In 1997 Eric Levande gave the keys of the apartment to a Scrantonian cop to have me placed at the psychiatric center of Community Medical Center in Pennsylvania for a 72 hour evaluation.
15. Throughout my marriage, Eric Levande sent his father to harrass me for monies and in 1999 he sent his father to harrass me for rent monies.
16. In 1999, I attempted to get an order of protection against my own in-laws for the harrassment of rent while being married to their son.
17. In 1999, Eric Levande convinced Judge Harhut (a judge he stood in front of many times) to have me committed to a mental hospital for attempting to get an order of protection against my in-laws that were harrassing me for rent monies.
18. Although legally I was married for 5 years, physically I was with Eric Levande maybe a full year.
19. Most of 1995, 1996 and 1997 I was away from Eric Levande and intermittently came back to "try out my marriage". When Eric Levande wanted me back to use me to campaign for him for judgeship, he came to my parents house and gave me a gold chain to come back to him.
20. Eric Levande swore that things would be different when he spoke to my parents and he promised he would rent an apartment, only to move back to his parent's

- house after 7 months because he claimed he could not afford \$450 dollars.
21. Viciously, wickedly and intentionally, Eric Levande brought me back to Scranton to use me to campaign for him.
 22. Viciously, wickedly and intentionally, Eric Levande disappeared throughout the marriage leaving me alone for long periods of time ranging from three days to a full week without answering his phone leading me to leave him and go back to New York.
 23. Viciously, wickedly and intentionally Eric Levande used sex to have children with me and therefore the sex was intermittent as well. When he wanted the first child he had sex with me for five days. When he wanted to have the second child he had sex with me for two days and I became pregnant.
 24. I met Steven Golden in the summer of 1996 when I was separated from Eric Levande at the Carlbach synogogue on the upper west side in the city.
 25. Although I came back to Eric Levande and had two children with him, I always thought of defendant Steven Golden but I forgot his name and lost the number he gave me.
 26. Sixteen years ago, my mother advised me to divorce my ex-husband and continue with Steven Golden. She said "get divorced and have all the sex you want if you really want him".
 27. Most of my marriage, I was back in new York speaking to marriage counselors, pyscologists and psychiatrists what I should do about my marriage and no one advised me to get divorced except a Kings County psychiatrist I saw at the outpatient clinic.
 28. Although I came back to Eric Levande and had two children with him, I always thought of defendant Steven Golden but I forgot his name and lost the number he gave me.

VICIOUSLY, WICKEDLY AND INTENTIONALLY ERIC LEVANDE PLANNED THE SEEDS OF MENTAL ILLNESS AGAINST ME DURING THE MARRIAGE AND NEVER INTENDED TO STAY MARRIED. IN JULY 1999, ERIC LEVANDE ASKED JUDGE HARHUT TO HAVE ME COMMITTED TO A PSYCHIATRIC HOSPITAL AND IN AUGUST 1999 ERIC RECEIVED A RUBBERSTAMP SOLE CUSTODY ORDER WITH NO VISITATION TO ME WITHOUT TRIAL. WITH THAT ORDER ERIC LEVANDE CAME TO THE FLORIDA AND NEW YORK COURT AND RECEIVED FULL CUSTODY OF THE OTHER DAUGHTER BASED ON THAT ORDER.

29. In July 1999, Eric Levande had me committed to a psychiatric hospital and then filed for sole custody. Eric Levande received sole custody with without any visitation to me by a rubberstamp order without trial through the same judge that had me arrested and then committed to a psychiatric hospital.

ERIC LEVANDE WAS A PARTY TO 6 ARRESTS AND HAD ME COMMITTED TO A PSYCHIATRIC HOSPITAL 3 TIMES BY HIS STATUS AS

A WELL KNOWN ATTORNEY IN LACKAWANNA COUNTY, SCRANTON PENNSYLVANIA, AND THEN HIS STATUS IN THE WEST PALM BEACH COURT WHERE HE HAD ACCESS TO COMPUTERS, PERSONNEL AND SPOKE TO JUDGES.

30. Viciously, wickedly and intentionally, Eric Levande used his status as a lawyer in Scranton, Pennsylvania and his position in West Palm Beach Florida court to have me arrested 6 times.

THE LAST ARREST MARCH 15, 2013 (6th ARREST).

DEFENDANT ERIC LEVANDE WICKEDLY CONTACTED STEVEN GOLDEN TO SLANDER AND DEFAME ME AND CONVINCE HIM TO HAVE ME ARRESTED LIKE HE DID WITH ALL THE OTHER FIVE ARRESTS.

31. On October 7, 2012, on the Jewish holiday of Simchat Torah, the giving of the torah, I met defendant Steven Golden at the West Side Institute synagogue in Manhattan.
32. I was at my heaviest weight, 148 lbs when Steven Golden met me (now I weigh 127) and that did not stop defendant Golden from approaching me and intending to use me for one night of passionate sex without informing me that he is the carrier of HPV, human papiloma virus.
33. My sister Goldie made an issue of my weight that I was disgusting looking. My mother told me to lose weight due to health issues even though she is heavy herself at 220 pounds and five feet three inches.

I BELIEVE STEVEN GOLDEN INTENDED TO USE ME FOR SEX THAT NIGHT BECAUSE OF MY WEIGHT AND THE FACT THAT HE KNEW ME FROM THE PAST OF HAVING SEX WITH HIM.

34. I did not recognize defendant Steven Golden, but Steven Golden recognized me immediately even though I was very heavy and I colored my dark brown hair to blonde. He reminded me that he was the guy that I spent a full day with 17 years ago, in the summer of 1996.

I HAVE NO LIFE. NO CAREER, NO SOCIAL LIFE, MY CHILDREN THAT I COULD NEVER SEE, I WAS VERY HAPPY TO SEE SOMEONE FROM MY PAST THAT MIGHT WANT ME.

35. With no career, no social life, children that I have that I could only see maybe once in two years and a mugshot online that I could not get rid of, I was happily to see a person from my past that I could connect with at my heaviest weight.
36. I forgot defendant Steven Golden's first and last name and wanted to search for him but did not know how to look for him. I remembered going to an apartment at 76th street, 17 years ago but did not go to any apartment to look for him. I was hoping that by coming to the upper west side I would see him one day. In my mind I wanted to be with him forever.
37. We walked out of the synagogue and walked into a diner where we had coffee and we talked. He spoke about himself and I got a sense that there was a ring of

truth to what he was telling me. He said that he wanted to date me and get to know me and at that moment I was in euphoria. In the back of my mind I thought to myself "I found the father of my future sons, I have daughters and now I will have sons with the only guy I ever wanted". I did not tell him that I have children and I wanted to leave that information for a later date after getting to know him to speak about my ex-husband and my daughters in Florida.

38. He mentioned that he was not dating anyone and not seeing anyone and I was very excited about that because every guy that I dated in the past cheated on me.
39. I was not expecting anything that night. I was at my heaviest weight and felt ugly. I just wanted to sleep. Defendant Steven Golden said that he was exhausted and very excited to see me again and I told him that I felt the same way. As soon as we got to his apartment in Queens, he kissed me, undressed me and took me straight to the shower. I did not resist because I was exhausted and at the same time excited and at the moment of passion did not think clearly.
40. We had sex from one in the morning till 11 a.m in the morning. He held me all night long and said to me "don't leave me this time". I was not aware of the mole he had on his penis which is a sign of HPV (Human papiloma virus) until the morning.

STEVEN GOLDEN IS LEGALLY RESPONSIBLE FOR TRANSMITTING AN HPV VIRUS AND SHOULD HAVE INFORMED ME THAT HE HAD A MOLE ON HIS PENIS.

41. Defendant Steven Golden never told me that he had a huge mole on his penis or that he had HPV. Steven Golden is a "GQ" type of guy who is well dressed and takes care of himself. He even hires the Zone company to cook and deliver all his meals to his door. His closet is full of expensive suits, shiny shoes, and ties lined up. His bedroom consists of a high king size bed with silk sheets on it. I find it hard to believe that he did not know or should have known that he is carrying the HPV virus.
42. In the morning we exchanged numbers and he told me that we will date and get to know each other. He put me in a cab back to Brooklyn.

I WAS BASICALLY USED AS A ONE NIGHT STAND WITHOUT A CONDOM WHEN HE KNEW HE HAD A SEXUALLY TRANSMITTED DISEASE OF HPV.

43. A few days later I texted him and he told me that he was in a meeting. Then I tried calling him up again and he would not answer. That is when I became infuriated and realized that I was totally used as a one night stand and texted him dozens of times. I tried calling him during the storm and that is when he blocked my number altogether at all the numbers I called him from.

HUMAN PAPILOVA VIRUS STICKS TO THE DNA FOREVER AND CAUSES CERVICAL CANCER. STEVEN GOLDEN TRANSMITTED THE HIGH RISK TYPE THAT WILL MOST PROBABLY TURN TO A FULL BLOWN CANCER.

44. A month later, on November 2012, I went to my gynecologist, Dr. Shawn and he told me that I have the high risk HPV, human papiloma virus. I told Dr. Shawn that I slept with Steven Golden that had a mole on his penis and he said that I got it from him.
45. I was very angry that defendant Golden transmitted the HPV virus to me and wanted to speak to him of "why me?" Why did you pick me out of all people to do this????

46. I went to his apartment and he told me to "go away, I don't want to speak to you". Then I came to his apartment and he did not answer the door so I left him a note. Since he did not answer his door, I faxed him a letter to his job in February.

FOR THREE WEEKS I WAS HUNTED DOWN BY DETECTIVE COGLIN ALMOST EVERYDAY. WHAT WAS SUPPOSE TO BE A DESK APPEARANCE BECAME A FULL BLOWN ARRESTS WITH TWO COPS RUNNING DOWN THE STREET AND JUMPING ON ME.

47. Toward the end of Febtusty 2013, detective Coglin started harrassing me by calling me two and three times a day to come down to Queens to the precinct. I was horrified. I could not eat, sleep or think. I knew that Eric Levande was behind this arrests and I was petrified. I couldn't do another arrests. Emotionally and physically I couldn't be arrested again for the sixth time.

48. Steven Golden contacted my mother, Miriam Shabtai and told her that I never told him that I was married in 1996 and that he was infuriated that I never let him know that I was married at the time. He said that Eric Levande contacted him out of the blues and that he found out that I was divorced with two kids.

DEFENDANT LEVANDE CALLED STEVEN GOLDEN AND PROVOKED HIM TO HAVE ME ARRESTED. ERIC LEVANDE ALSO SLANDERED ME TO STEVEN GOLDEN TO THE POINT THAT DEFENDANT GOLDEN WANTED TO TAKE THE MUGSHOT ONLINE AND THREATENED THAT HE WOULD SENT IT TO ALL THE SYNOGOGUES IN NEW YORK

49. Finally I did speak to defendant Golden before the arrest and he told me that Eric Levande called him and then sent him a few emails about me.

50. Defendant Golden threatened that he will sent the mugshot that appears online (through mugshot.com) to all the synogogues in New York to defame me and slander me.

VICIOUSLY, WICKEDLY AND INTENTIONALLY, ERIC LEVANDE CONVINCED STEVEN GOLDEN THAT I WANT MONIES FROM HIM WHEN I REALLY LIKED HIM AND WANTED HIM. SUDDENLY WE WENT FROM PASSIONATE SEX FOR 10 HOURS TO THREATENING ME THAT HE WILL SENT MY MUGSHOT TO ALL THE SYNOGOGUES IN NEW YORK CITY.

STEVEN GOLDEN CALLED ME AND SAID "WHAT DO YOU WANT FROM ME? HUH, DO YOU WANT MONIES, IS THAT WHAT YOU REALLY WANT? I BELIEVE HE WAS RECORDING ME TO ATTEMPT TO GET ME

ON AN EXTORTION CHARGE WHEN ALL I REALLY WANTED WAS TO HAVE A BOYFRIEND AND A FUTURE PARTNER.

51. He also called me and said "What do you from me? Huh, do you want monies, Is that what you really want?" I believe Steven Golden with the advise of Eric Levande attempted to get an extortion charge against me as well by recording me. He suddenly called me in March 2013, when he blocked my number 5 months earlier at super storm sandy, in the end of October 2012.

52. On March 15, 2013, I was jumped by two cops, detective Coglin and another cop and driven from Mill Basin to the 103rd precinct in Queens.

THE SAME COCKY DETECTIVE COGLIN WHO BOASTED HOW GREAT HE IS AT HIS JOB, ALSO ALARMED ME OF THE SET UP THAT TOOK PLACE TO HAVE ME ARRESTED, EXTRADITED TO FLORIDA AND DETAINED FOR 13 MONTHS.

53. Detective Coglin who had me handcuffed in the car all the way from Brooklyn to Queens boasted how amazing he is as a detective. Then egotistically he said "did you know that the grade A detective from the NYPD worked with your husband to set you up to have you extradited to Florida? Mmm, he said "Your ex-husband loves to call all the detectives at the NYPD?" "Grade A detective Huh"

54. The arresting officer was horrible at the 103rd precinct. Officer Lopez said that because I had sex with Steven Golden, I cannot be given a desk appearance ticket but must be arrested and sent to central booking.

55. I was viciously, wickedly and intentionally held 12 hours in the precinct, with 4 hours officer Lopez rolled my small fingers through the fingerprint machine on an invalid aggravated harrassment charge which was suppose to be a desk ticket.

56. Officer Lopez viciously, wickedly and intentionally rolled my fingers for hours in the hope that I would punch her or do something else and she could bring more charges against me. When I realized this, I told her that "I would not touch you, I know what you are doing".

57. Then another female officer (black young officer at the time said to me) "I would never get to your position, with all the arrests and like this". We have seen your arrests record. I told her "you never know, you might meet a guy who will marry you for 10 years and then one day dump you with all your monies and status you have". I immediately shut her up.

58. I was called a "Lindsey Lohan" by detective Coglin and intentionally held there unnecessarily for 12 hours on a full blown arrests on A CHARGE THAT SHOULD HAVE BEEN A DESK TICKET APPEARANCE.

59. How do you go from 10 hours of passionate sex (with HPV transmittal) to being arrested for having sex when I received an STD, sexually transmitted disease from defendant Golden.

60. Due to the arrests I lost an engineering position with the city of New York that I waited for years. Since the charge was still pending the City of investigations refused to have me hired in May 2013.

61. The charge of aggravated harrassment was dismissed on June 21, 2013, at the desk appearance court in queens criminal court. I should never have been arrested but only given a desk appearance ticket.
62. I am emotionally, economically and socially damaged and I cannot sustain any form of relationship with anyone. I am totally a broken vessel.

ERIC LEVANDE USED THE LEGAL SYSTEM TO HARRASS AND CONTROL ME BY HAVING ME ARRESTED AND HAVE ORDERS OF PROTECTION TAKEN OUT AGAINST ME BY HIM, HIS MOTHER, FATHER AND SISTER FROM 1995 THROUGH MARHC 2013 WHICH IS A CIVIL RIGHTS VIOLATION AND SHOULD BE ARRESTED HIMSELF.

ARREST NUMBER 1

63. In 1995, three months after marrying Eric Levande, Eric Levande took out an order of protection against me unbeknown to me and then brought cops to have me arrested and be put in the Lackawanna county jail.
64. Eric Levande's friend at the time, Mr. Phillips an attorney in town called a judge in the middle of the night to get me out of jail. I was in shock and later left to New York.
65. Unfortunately and sadly, I did not understand the magnitude of how big of a sociopath Mr. Levande is and stupidly stayed married to Eric Levande.

ARREST NUMBER 2.

66. In April 1999, while still married to his son Eric Levande my ex-father in law sued me for rent. What normal father in law sues his daughter-in-law for rent?
67. In 1999, when my in-laws, sued me for rent and harrassed me for rent monies, I tried to get an order of protection against them. The presiding judge was Judge Harhut, the same judge Eric Levande appeared in front of as an attorney.
68. Although Judge Harhut knew Eric Levande, he did not recuse himself.
69. That morning before going to court I had sex with Eric Levande and I was pregnant with my second daughter Sarah. In the morning he had sex with me and then three hours later, Eric Levande was on speakerphone with Judge Harhut telling him that I was (unstable", a "dangerous to society and myself", "out of control", a "paranoic schizophrenic", a "bipolar".
70. Immediately, I was arrested in court and put in detention for 24 hours and then transferred to the Community Medical Center psychiatric unit and stayed there for 4 days. I was only allowed to leave the psychiatric center on the condition that I would leave Scranton, Pennsylvania and not return.
71. After being released from Community Medical Center I tried reaching Eric Levande but he disconnected his phone and I was not able to see my 13 month old daughter that I was breastfeeding at the time.
72. I tried reaching my in-laws and my sister in-laws but they did not answer either for a full month. I stayed in my ex-in-laws house that they sued me for rent. They

shut off the electricity and shut off the water so that I would leave Scranton Pennsylvania.

73. A month later, I received an order in the mail claiming that Eric Levande received sole custody with no visitation to me. I DID NOT SEE MY DAUGHTER ANNIE FOR THREE YEARS FROM THAT DATE.
74. Because Judge Harhut gave sole custody to Eric Levande with no trial, no judge in Florida and New York believed that Eric Levande committed perjury and maneuvered the court to deprive me of my child and basic economic needs.
- ARMED WITH THE ORDER OF SOLE CUSTODY, ERIC LEVANDE TOLD EVERYONE IN THE COURT THAT I AM UNSTABLE AND "DANGEROUS"
75. Armed with a sole custody order with no visitation to me that was rubberstamped with no trial, Eric Levande committed perjury to both the Florida court (Diane Kirigin, the master in Florida and Judge Esther Morgenstern) that I am unfit to be the mother of the second trial.
76. With no trial, Judge Esther Morgenstern allowed Eric Levande to take Sarah, the minor child to Florida for visitation which was a ruse and then gave him temporary custody when my mother allegedly came to her house. What does my mother coming to Judge Esther Morgenstern's house has to do with giving custody to Eric?
77. Then Judge Clark, a judge that was about to retire after my trial, gave Eric Levande full custody of the second child because he claimed that "I was not able to behave in court". How could I possibly behave in court watching a psychologist, Dr. Laura Marullo fabricating that I sexually abused my daughter Sarah and Judge Clark refusing to hand back my child when he was supposed to do so?

ARREST NUMBER THREE- defendant detective Jon Hafner never asked me what happened? Or what transpired. He just wanted to have me arrested for a credit as an arrests.

78. In 2003, I hired Phillip Skittone, a brooklyn attorney to file an amended complaint on my behalf on a lawsuit that was filed pro se in Brooklyn federal court. The lawsuit was against defendant Eric Levande for bogusly having me admitted to the pyschiatric hospital of community medical center.
79. Mr. Skittone took three thousand dollars from me and then handed me a "how to do an amended complaint" two days before the amended complaint was due.
80. When I asked Phillip skittone "why he did this to me?" Mr. Skittone said "I spoke to your husband and I am not doing anything for you". When I told him that I gave him three thousand dollars, he threw me out of the office and told him that he cannot speak to me anymore.
81. I called Phillip skittone and called him a "piece of shit and told him that I wish he would get cancer" for stealing three thousand dollars from me and because of that my lawsuit was dismissed.
82. I wrote Judge Block of the Eastern District court that I hired attorney Skittne and

he gave me a "how to do an amended complaint", however because the amended complaint was not handed in, it was dismissed.

83. I sued Phillip Skittone in state court. However, on the day that I was supposed to appear in court, I received a phone call from a detective Hafner that he wanted to speak to me "in the afternoon".

84. I was clueless what was about to happen. The detective took my identification and put me in a room and I asked him "what is all this about????". He waved a tape and said "you are under arrests for extorting monies from Phillip Skittone.

ERIC LEVANDE AIDED AND ABETTED PHILLIP SKITTONE TO HAVE ME ARRESTED ON A BOGUS CLAIM BY SPEAKING TO DETECTIVE JON HAFNER WHEN PHILLIP SKITTONE HIMSELF STOLE MONIES FROM ME AND GAVE ME A "HOW TO DO AN AMENDED COMPLAINT" FOR \$3,000.

85. Then detective Jon Hafner said "I spoke to your husband and Phillip Skittone and they told me everything". Phillip Skittone identified you as the woman who threatened him and tried to extort monies from him.

86. Between being arrested and going to central booking, I spent two days detained. What was worse is spending over a year and a half going to criminal court almost every month and refusing to plead down to anything that was overed.

87. I was emotionally tortured by the prosecution for a year and a half based on the worthless and useless work of detective Jon Hafner that never asked me what happened and basically just arrested me because he needed the credit for an arrest.

88. I spent writing dozens of motions to the judges and to the prosecutors of what Mr. Skittone did all to no avail. I had to switch attorneys until the charges were dismissed. I was tortured due to a bogus arrests that was being aided and abetted by Eric Levande.

ARREST NUMBER 4- viciously, wickedly and intentionally Eric Levande used his connections and status of his job with the West palm Beach courthouse to get detective Derek Wright to have me arrested for no reason whatsoever when the prosecution themselves refused to have me prosecuted.

89. While I was fighting for custody of my children, Eric Levande viciously, wickedly and intentionally took out orders of protection against me in Florida without notifying me. He took out orders of protections behind my back and then had me arrested.

90. In one of these orders of protections behind my back, I was arrested for a "violation of an order of protection" by a grade A detective, detective Derek Wright based on Eric Levande's emails and faxes for six months to detective Derek Wright.

91. In 2003, in one of the court appearances in Brooklyn criminal court on the skittone case, two detective, one of them is Detective Derek Wright came to arrest me right after one of my appearances in the skittone case in criminal Brooklyn court.

92. While being locked up in the precinct, I overheard another detective say to grade A detective Derek Wright "Are you sure this arrest is legit?" Detective Derek Wright said "yes, I have all the faxes from Levande, its legit". Then I overheard detective Derek Wright say (while I am listening to all this) "she's nut, her husband took her kids, I will help him get her locked up for a long time".

93. I was detained for a full day, 24 hours and the prosecutors declined prosecutions on this particular charge.

ARREST NUMBER 5- OCT 24, 2004 TILL DECEMBER 2005
DETENTION IN SEVERAL FLORIDA JAILS.

94. In August 2004, I appealed Judge Clark's decision of giving Eric Levande's full custody of my children without giving me visitation.

95. Defendant Eric Levande viciously, wickedly and intentionally planned out an extradition so that I should lose custody of an appeal for my children and lose my kids forever. He made sure that I would not be able to appear in court of appeals in Brooklyn in September 2005 and the judges would know that I am detained in a Floridian jail for a stalking charge and "false child abuse reporting".

96. Interestingly, every judge that I was in front of when it came to custody either was about to retire, was moved out of the case after two or three hearings or was known to be the worse judges in the system for example I judge Art Wroble that kicked out of the bench that signed an order against me not allowing me to represent myself and red flagged me from asking visitation for my children. I had two attorneys in Florida after that (one attorney Peter Perettine and Richard Dedell) that basically took \$5,000 a piece and I never received visitation of my children.

97. In July 2004, Eric Levande bogusly wrote to the Children and Family services in Florida and asked them to bring a \$10,000 fine against me for calling the child abuse hotline of Florida and accusing him of sexually abusing my children.

98. I NEVER CALLED THE CHILD ABUSE HOTLINE OF FLORIDA AND ACCUSED HIM OF SEXUALLY ABUSING MY CHILDREN. In fact he brought Dr. Laura Marullo to Queens Family Court in April 2004 to accuse me of sexually abusing my daughter Sarah who was 3 years old at the time and judge Clark, never gave me back my children when he should have done so under the law.

99. I wrote back to the children and Family services of Florida and showed them that Eric Levande accused me of sexually abusing my daughter Sarah and in fact brought a psychologist to the court to do so. The case was closed and a fine was waived.

100. **Meantime FOR SIX MONTHS**, Eric Levande was emailing Gary Mendelsohn of Tallahassee in the prosecution office of Tallahassee that I am crazy and a danger to myself and others and he should get a warrant against me for extradition for "false child abuse reporting". My voice was not on that tape accusing him of sexually abusing my kids. I BELIEVE THAT DR. LAURA MARULLO WHO

ERIC LEVANDE BROUGHT TO THE QUEENS FAMILY COURT IS THE ONE THAT CALLED. I BELIEVE THAT I WAS SET UP TO BE ARRESTED, EXTRADITED AND DETAINED IN JAIL BY ERIC LEVANDE HIMSELF.

101. Knowing that I would go to the police, defendant Eric Levande intentionally took out credit cards under "Sarah Levan" name, did not pay it, and mailed it to the Brooklyn address to set me up to have me arrested and extradited to Florida on the charge of "false child abuse reporting and a stalking charge, some invalid trumped up charges fabricated by Eric Levande.

I WAS SET UP TO COME TO THE 63RD PRECINCT CONCERNING ABOUT CARD CHARGES UNDER MY DAUGHTER'S NAME SARAH LEVAN IN ORDER TO HAVE ME EXTRADITED TO FLORIDA. THIS WAS DONE BY DETECTIVE DEREK WRIGHT AND ANOTHER DETECTIVE THAT I DID NOT TAKE HIS NAME AT THE TIME.

102. I went once to the 63rd precinct to complain about the card charges under my daughters name when a few detectives called me in about the 'CARD CHARGES' IN ORDER TO HAVE ME EXTRADITED TO FLORIDA ON SOME BOGUS CHARGES AND DETAIN ME FOR 13 MONTHS.

IN NEW YORK RIKERS ISLAND I WAS DEEMED MENTALLY SANE AND NORMAL HOWEVER WHEN I GOT TO FLORIDA'S JAIL WHERE ERIC LEVANDE SPOKE TO THE PROSECUTION AND PSYCHIATRISTS OF THE PROSECUTION LIKE DR. LELLAND AND DR. SPENCE, I WAS SUDDENLY DEEMED VERY MENTALLY ILL AND INCOMPETENT LEAVING ME DETAINED FOR 13 MONTHS WITH NO COURT DATE IN SIGHT.

103. I was detained for 3 weeks in Rikers Island where I was deemed sane and normal by three unbiased psychiatrists who have been working for decades, however when I got to Florida I was a "paranoic schizophrenic" and every mental illness there is possible.
104. I was extradited in a van from state to state and finally placed in Tallahassee jail. From Tallahassee jail, I went to West Palm Beach jail where I had a no bond hold for a stalking charge AND VIOLATIONS OF ORDERS OF PROTECTIONS THAT I NEVER KNEW EXISTED WHICH ERIC LEVANDE TOOK AGAINST ME BEHIND MY BACK based on a tape recording that was made to my sister-in-law. What does my sister-in-law in Pennsylvania in 1999 has to do with 2004?

ERIC LEVANDE CONTINUED TAKING OUT ORDERS OF PROTECTIONS AGAINST ME WHILE I WAS DETAINED AND THE JUDGE ALLOWED IT IN FLORIDA. AND HIS MOTHER AND SISTER BOTH TOOK OUT AN ORDER OF PROTECTIONS AGAINST ME IN SCRANTON PENNSYLVANIA WHILE I WAS DETAINED.

105. Even while I was in jail in Florida, my mother-in-law and sister-in-law

viciously and bogusly took out an order of protection against me in the state of Pennsylvania. What do they have to do with it???

106. I was examined by a psychologist in West Palm Beach that found me competent and normal in December 2004, however in January 2005 when I got to the Tallahassee jail I became incompetent and again the alphabet soup of mental illness.
107. Based on what Eric Levande told Sandra Coulter, this defense attorney made sure that I would stay in jail and LIED THAT SHE HEARD MY VOICE ON THE CHILD ABUSE HOTLINE ACCUSING ERIC LEVANDE OF child sexual abuse. I never accused Eric Levande of any sexual abuse of my child. In fact the two psychologist, Dr. Lelland and Dr. Spence, and Dr. Mason, the child psychiatrists all lied for defendant Eric Levande to keep me detained for 13 months and locked up.
108. In the West Palm Beach jail they tortured me moving me from jail to jail and calling out my name dozens of times out loud to embarrass me for no reason.
109. In the Tallahassee jail they had me in a dark dungeon for a full month and gave me food through a hole. I was emotionally tortured to the point that when I came out I looked like a concentration camp victim at 108 lbs and basically emotionally I was ruined.
110. In the West Palm Beach courthouse, Eric Levande committed perjury and claimed that he was scared of his life in November 2004 so that I should not receive a bond, however I was in Eric Levande's house in March 2003 visiting my daughters. IF I WAS SUCH A DANGER TO MYSELF AND SOCIETY WHY DID ERIC ALLOW ME IN HIS HOUSE IN MARCH 2003 HOWEVER 8 MONTHS LATER CLAIMED TO THE JUDGE THAT I AM A DANGER TO HIM?
111. Viciously, wickedly and intentionally, my parent's paid a private attorney, Timothy Jansen who took \$5,000 from my parents and never filed the report showing that I am sane and competent to stand trial leaving me moved to another detention facility, the state psychiatric center of Chatahoochee.
112. Viciously, wickedly and intentionally, Eric Levande had a bag of tricks whereby he played a tape recording from 1999 THAT WAS USED IN EVERY COURT FROM JUDGE HARHUT IN AUGUST 1999 TO EVERY IMAGINABLE COURT UP UNTILL CALLING DETECTIVE COGLIN IN FEBRUARY 2013 TO PROVE THAT I AM MENTALLY ILL. Non of these professional cocky egotistically morans ever asked the sociopath defendant Eric Levande when was these recording made and who is Devorah speaking to.


WHEREFORE, I REQUEST THE COURT,

a) Award an order too clear my name of all these arrests so that mugshot.com and any other arrest organization would not be able to use my photo for public use which prevents me from getting any employment or have any job.

b) bring civil rights violations against Eric Levande and Steven Golden that includes jail time.

C) Award \$500,000 monetary damages for the loss of employment from 2003 till now due to these six arrests. d) Award monetary damages of \$2,000,000 for emotional distress and torture that I suffered during incarceration and thereafter against the above defendants. e) Award punitive damages of slander, defamation and invalid arrests and detentions from the above defendants. The above defendants detectives were zealous to make an arrests to receive credits for these arrests without speaking to plaintiff Devorah about what was going on. They just heard from defendant Eric Levande and just took his words for it based on what he told them.

Sincerely,

A handwritten signature in cursive script, appearing to read "Devorah Shabtai", written over a horizontal dashed line.

Devorah Shabtai